

EXHIBIT 43

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Page 1

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CIVIL NO. 18-1776 (JRT/HB)

0:21-MD-02998-JRT-HB

MDL NO. 2998

IN RE: PORK ANTITRUST LITIGATION

This Document Relates to: All Actions

HIGHLY CONFIDENTIAL
REMOTE VIDEO DEPOSITION OF
KENNETH M. GRANNAS, JR.

December 17, 2021

REPORTED BY: Laura H. Nichols
Certified Realtime Reporter,
Registered Professional
Reporter and Notary Public

1 Q. (BY MR. SHIFTAN:) Does Triumph do
2 any direct sales?

3 A. Not that I am aware of.

4 Q. Do you have any sense as to how
5 revenues are split between Seaboard and Triumph for
6 pork that is produced by Triumph?

7 MR. SMITH: Object to form,
8 foundation.

9 MR. THOMSON: Objection.

10 A. Not specific.

11 Q. (BY MR. SHIFTAN:) What general sense
12 do you have?

13 A. Basic fifty-fifty.

14 Q. Do you have a sense as to which
15 employees at Triumph would be good people to talk
16 to about the particulars of the marketing agreement
17 between Seaboard and Triumph?

18 MR. SMITH: Object to form,
19 foundation.

20 A. Upper executive is all I could say
21 there. I don't know who in particular.

22 Q. (BY MR. SHIFTAN:) Does Triumph
23 export meat?

24 MR. SMITH: Object to the form,
25 foundation.

1 A. Triumph's meat is exported.

2 Q. (BY MR. SHIFTAN:) And do you have
3 any responsibilities pertaining to exports?

4 A. I don't understand the question.

5 Q. In your day-to-day job at Triumph, do
6 you conduct any analysis pertaining to meat that is
7 exported?

8 MR. SMITH: Object to form.

9 A. Just the volume of production.

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 MR. SMITH: Objection, form.

15 Q. (BY MR. SHIFTAN:) Not that you are
16 aware of?

17 A. Not that I am aware of.

18 Q. Are you general -- are you privy to
19 business plans pertaining to how much meat to
20 export versus sell domestically?

21 A. No.

22 Q. What types of pork cuts does Triumph
23 export?

24 MR. SMITH: Object to form,
25 foundation, assumes facts not in evidence and

1 mischaracterizes testimony.

2 [REDACTED]
3 [REDACTED]
4 [REDACTED] [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED] [REDACTED]
12 [REDACTED]
13 [REDACTED] [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

22 MR. SHIFTAN: I would like to mark
23 the next document, which is Tab U, Bates Number
24 ending in -- it is a Triumph Bates Number ending in
25 457477. And this will be marked as Exhibit

1 Number --

2 THE REPORTER: 169.

3 MR. SHIFTAN: -- 169.

4 (Exhibit 169 was marked for
5 identification.)

6 Q. (BY MR. SHIFTAN:) Do you have
7 Exhibit 169 in front of you?

8 MR. SMITH: No, he doesn't. Give me
9 a second. These were packaged in two different
10 redwells, so I have to open up each set twice.

11 MR. SHIFTAN: Take your time.

12 MR. SMITH: I'm sorry. Did you say
13 the Bates Number was 457477?

14 MR. SHIFTAN: That's correct.

15 MR. SMITH: There you go.

16 A. Yes, I have it.

17 Q. (BY MR. SHIFTAN:) Why don't you just
18 take a moment to review it and look up when you
19 have had a chance to.

20 (Pause.)

21 A. Okay.

22 Q. (BY MR. SHIFTAN:) Do you recognize
23 this document?

24 A. I recognize it, but I don't recall
25 it.